

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

EPIC TECH, LLC,

Plaintiff,

v.

VGW LUCKYLAND, INC. and VGW
HOLDINGS US, INC.,

Defendant.

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) Civil Action No. 1:23-cv-0118-RGA
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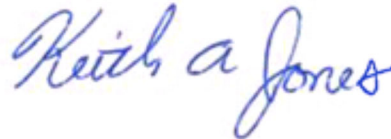
DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

I, Keith A. Jones (“Declarant”), do hereby state, under penalty of perjury, the following true and accurate facts to the best of information and belief:

1. I have personal knowledge of the matter asserted herein.
2. I am engaged as counsel for Plaintiff Epic Tech, LLC (“Plaintiff”) in this action.
3. Plaintiff filed its Complaint herein against Defendants VGW Luckyland, Inc. (“VGW Luckyland”) and VGW Holdings US, Inc. (“VGW Holdings”) (collectively, (“Defendants”) on January 31, 2023. *See* (D.I. 1).
4. On February 3, 2023, Plaintiff caused the Summons and Complaint, along with the filed exhibits, to be served upon VGW Luckyland. *See* (D.I. 7).
5. On February 3, 2023, Plaintiff caused the Summons and Complaint, along with the filed exhibits, to be served upon VGW Holdings. *See* (D.I. 8).
6. Under the Federal Rules of Civil Procedure, Defendants’ deadline to answer, move, or otherwise respond to Plaintiff’s Complaint was February 24, 2023.
7. Neither Plaintiff nor the Court have granted Defendants an extension of time to answer move, or otherwise respond to Plaintiff’s Complaint.

8. Defendants have failed to answer, move, or otherwise respond to Plaintiff's Complaint as required by Federal Rules of Civil Procedure 12(a)(1)(A). For this reason, Plaintiff, in accordance with Rule 55(a) of the Federal Rules of Civil Procedures, respectfully requests that the Clerk enter an Order of Default, in the form attached hereto, against Defendants VGW Luckyland, Inc. and VGW Holdings US, Inc.

I declare under penalty of perjury that the foregoing is true and correct.



Executed on March 7, 2023

Keith A. Jones